

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION**

AMERICAN SECURITY & AUDIO VIDEO	)	
SYSTEMS, INC., <i>et al.</i> ,	)	
	)	
Plaintiffs,	)	CASE NO. 5:21-cv-1416
	)	
v.	)	
	)	JUDGE BRIDGET MEEHAN BRENNAN
RONALD BAXTER, <i>et al.</i> ,	)	
	)	
Defendants.	)	
RONALD BAXTER,	)	
	)	
Plaintiff,	)	
	)	CASE NO. 5:21-cv-2230
v.	)	
	)	
FRANK BAXTER, <i>et al.</i> ,	)	JUDGE BRIDGET MEEHAN BRENNAN
	)	
Defendants.	)	
	)	

**JOINT STIPULATION OF DISMISSAL WITHOUT PREJUDICE**

The parties, by and through undersigned counsel and pursuant to Fed. R. Civ. P. 41(a)(1)(A)(ii), hereby stipulate to the dismissal of the counterclaims asserted by Frank Baxter, American Security & Audio Video Systems, Inc., Baxter Property Management, LLC, and American-Securicom, Inc. in consolidated case no. 5:21-cv-2230-BMB without prejudice.

Dated: March 24, 2023

Respectfully submitted,

/s/ Daniel J. Rudary

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*Counsel for Ronald Baxter, Andrea Baxter, and  
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**CERTIFICATE OF SERVICE**

I hereby certify that on the 24th day of March, 2023, a copy of the foregoing was filed electronically. Notice of this filing will be sent to all parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

/s/ Daniel J. Rudary

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